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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CELLINK CORP.

Plaintiff,

vs.

MANAFLEX LLC,

Defendant.

CASE NO. 4:23-cv-04231-HSG

**STIPULATED FIRST REQUEST FOR  
ORDER MODIFYING HEARING  
SCHEDULE RE: CELLINK CORP.'S  
MOTION TO FILE FIRST  
AMENDED COMPLAINT AND  
ORDER (as modified)**

**[Civil L.R. 6-2]**

Demand for Jury Trial

Complaint Filed: August 18, 2023

1 Plaintiff CelLink Corp. (“Plaintiff”) and Defendant Manaflex LLC (“Defendant”)  
2 (together, the “Parties”) hereby stipulate under Civil Local Rule 6-2(a) to request an order to  
3 continue the hearing date for Plaintiff’s Motion for Leave to File its First Amended Complaint  
4 from October 24, 2024 to November 14, 2024.

5 This requested first continuance is warranted to accommodate personal travel for  
6 Manaflex’s counsel that has been preplanned and booked since early in this year. Declaration of  
7 Alison Anderson (“Anderson Decl.”) ¶ 4.

8 There have been five previous extensions of time in this case:

9 (1) a stipulated extension of time to respond to the complaint that was filed on  
10 September 11, 2023 and granted on September 12, 2023. Anderson Decl. ¶ 5.

11 (2) a stipulated extension of time for the Parties to file a Joint Case Management Statement  
12 and selecting an ADR process that was filed on November 7, 2023 and granted on  
13 November 8, 2023. *Id.*

14 (3) a stipulated extension of time to respond to counterclaims that was filed on  
15 November 27, 2023 and granted on November 28, 2023. *Id.*

16 (4) a stipulated extension of time to respond to counterclaims that was filed on  
17 June 12, 2024 and granted on June 12, 2024. *Id.*

18 (5) a stipulated request for an order modifying the Parties’ briefing schedule related to  
19 Plaintiff’s motion to dismiss Defendant’s unfair competition counterclaim filed on July 17, 2024  
20 and granted on July 18, 2024. *Id.*

21 The brief extension of time requested here would have no effect on any other scheduled  
22 deadlines for the case. This is the Parties’ first request to continue this hearing. Anderson  
23 Decl. ¶ 6.

1 Dated: October 14, 2024

BOIES SCHILLER FLEXNER LLP

2 /s/ Alison L. Anderson

3 Alison L. Anderson

4 Eric J. Maurer

Beko Reblitz-Richardson

5 *Attorneys for Defendant Manaflex LLC*

6  
7 Dated: October 14, 2024

/s/ Andrea Levenson

HAYNES BOONE

8 Jason Lao

9 Brian Kwok

Ken Parker

10 Andrea Levenson

11 *Attorneys for Plaintiff CelLink Corp.*

12  
13  
14  
15  
16  
17 **ECF ATTESTATION**

18 I, Alison L. Anderson, am the ECF User whose ID and password are being used to file this  
19 Stipulated Request For Order Modifying Briefing Schedule re: CelLink Corp.'s Motion To  
20 Dismiss Manaflex LLC's Unfair Competition Counterclaim and [Proposed] Order. In compliance  
21 with Civil Local Rule 5-1(i)(3), I hereby attest that Andrea Levenson, counsel for CelLink Corp.,  
22 has concurred in this filing.

23  
24 Dated: October 14, 2024

25 /s/ Alison L. Anderson

26 Alison L. Anderson

**PURSUANT TO STIPULATION, IT IS SO ORDERED:**

The hearing for Plaintiff's Motion for Leave to File its First Amended Complaint, presently on calendar to be heard October 24, 2024, is continued to November 14, 2024 at 2:00 p.m.

Dated: 10/15/2024



The Honorable Haywood S. Gilliam, Jr.

United States District Judge